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Attorneys for Defendants  
IRWIN S. ROTHENBERG and  
PISENTI & BRINKER LLP

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHARLES O. BRADLEY TRUST, LINDA L.  
BRADLEY TRUST, KEN & SHARON BURGE  
TRUST, BRAD MARTIN BURGE, SCOTT &  
NOA L. DYKSTRA, RONALD C. HALL,  
RENTAL CENTER PROPERTIES, a California  
Partnership,

Plaintiffs,

vs.

ZENITH CAPITAL LLC; TASKER COOPER  
SMITH/ZENITH GROUP LTD;  
TASKER COOPER SMITH/ZENITH GROUP  
LLC; PISENTI & BRINKER LLP;  
RICK LANE TASKER, (aka Rick Tasker);  
MARTEL JED COOPER (aka Jed Cooper);  
GREGG SMITH; IRWIN S. ROTHENBERG  
(aka Irv Rothenberg); and DOES 1 through  
50, inclusive,

Defendants.

CASE NO. C 04 2239 EZ JSW (EMC)

**STIPULATION AND [PROPOSED]  
ORDER TO PROTECT  
CONFIDENTIALITY OF  
DOCUMENTS PRODUCED IN  
RESPONSE TO ORDER GRANTING  
PLAINTIFFS' MOTION TO COMPEL  
DEFENDANT ROTHENBERG TO  
PRODUCE DOCUMENTS**

This Stipulation is entered by and between Plaintiffs CHARLES O. BRADLEY  
TRUST, LINDA L. BRADLEY TRUST, KEN & SHARON BURGE TRUST, BRAD  
MARTIN BURGE, SCOTT & NOA L. DYKSTRA, RONALD C. HALL, and RENTAL

1 CENTER PROPERTIES (collectively "Plaintiffs") and Defendant Irwin S. Rothenberg  
2 ("Rothenberg") by and through their respective counsel of record.

3 On or about January 3, 2006, the Court issued an Order granting Plaintiffs' motion to  
4 compel Defendant Rothenberg to produce documents in redacted form (the "January 3, 2006  
5 Order"). Pursuant to the January 3, 2006 Order, Rothenberg was required to produce the  
6 documents "under protective order providing for use only in this litigation absent stipulation  
7 or court order otherwise."

8 **ACCORDINGLY, IT IS STIPULATED AS FOLLOWS:**

9 1. Documents produced by Rothenberg pursuant to the January 3 Order shall be  
10 labeled "Confidential" and identified by bates numbers IR 000870 – IR 0011096 (the  
11 "Documents").

12 2. The Documents and the information contained therein shall be used for  
13 purposes of prosecuting, defending or attempting to settle this litigation only.

14 3. The Documents and the information contained therein shall be disclosed only  
15 to the parties to the litigation, their counsel, employees of their counsel, experts retained by  
16 the parties, court reporters, and court personnel, as necessary.

17 4. The Documents may be disclosed during depositions, including those of  
18 witnesses in the action to whom disclosure is reasonably necessary and who have agreed to  
19 maintain the confidentiality of the Documents in accordance with this Stipulated Protective  
20 Order. Pages of transcribed deposition testimony or exhibits to depositions that concern or  
21 consist of the Documents shall be separately bound by the court reporter and labeled  
22 "Confidential" and shall not be disclosed to anyone not authorized by this Stipulated  
23 Protective Order.

24 5. Absent court order or stipulation, the filing of the Documents in the action  
25 shall be under seal and in compliance with Northern District Civil Local Rule 79.5.

26 6. At the conclusion of the litigation, the Documents and any copies or  
27 summaries shall be returned to Rothenberg or, with the permission of Rothenberg, destroyed.  
28

1 Dated: January 20, 2006

FRIEDEMANN GOLDBERG LLP

2 By: 

3 KYLE M. FISHER

4 Attorneys for Defendants

5 IRWIN S. ROTHENBERG and

6 PISENTI & BRINKER LLP

7  
8  
9 Dated: January 20, 2006

JOHNSON & MISKEL

10  
11 By: 

12 GERALD L. WILLIAMS

13 Attorneys for Plaintiffs

14 CHARLES O. BRADLEY TRUST,

15 LINDA L. BRADLEY TRUST,

16 KEN & SHARON BURGE TRUST,

17 BRAD MARTIN BURGE,

18 SCOTT & NOA L. DYKSTRA,

19 RONALD C. HALL, RENTAL

20 CENTER PROPERTIES, a California

21 Partnership

**[PROPOSED] ORDER**

Based on the stipulation of the parties and in accordance with the January 3, 2006 Order and good cause appearing therefore, **IT IS HEREBY ORDERED AS FOLLOWS:**

1. Documents produced by Rothenberg pursuant to the January 3 Order shall be labeled "Confidential" and identified by bates numbers IR 000870 – IR 001096 (the "Documents").

2. The Documents and the information contained therein shall be used for purposes of prosecuting, defending or settling this litigation only.

3. The Documents and the information contained therein shall be disclosed only to the parties to the litigation, their counsel, employees of their counsel, experts retained by the parties, court reporters, and court personnel, as necessary.

4. The Documents may be disclosed during depositions, including those of witnesses in the action to whom disclosure is reasonably necessary and who have agreed to maintain the confidentiality of the Documents in accordance with this Stipulated Protective Order. Pages of transcribed deposition testimony or exhibits to depositions that concern or consist of the Documents shall be separately bound by the court reporter and labeled "Confidential" and shall not be disclosed to anyone not authorized by this Stipulated Protective Order.

5. Absent court order or stipulation, the filing of the Documents in the action shall be under seal and in compliance with Northern District Civil Local Rule 79.5.

Dated: January 23, 2006

